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RECOUPMENT OF SIGNATURE CREDIT
WILL IT BANKRUPT THE US TREASURY?

15th March 2026

Foundations of Nonpayroll Federal Income Tax Withholding

The administration of federal income tax withholding in the United States is bifurcated between payroll-related obligations and nonpayroll distributions. While the former is reported via the well-known Form 941, the latter is governed by the regulatory requirements of IRS Form 945, the Annual Return of Withheld Federal Income Tax. This reporting mechanism is critical for financial institutions and nominee entities that manage distributions from retirement plans, annuities, gambling winnings, and, most importantly for the banking sector, backup withholding on reportable payments.

The technical mandate for Form 945 arises when a payer—often acting as a nominee or middleman—withholds or is required to withhold federal income tax from nonpayroll payments. The scope of these payments is expansive, including distributions from tax-favoured retirement plans such as section 401(k), 403(b), and governmental section 457(b) plans. For the reporting period spanning 2022 through 2025, the institutional compliance burden has been defined by the need to aggregate these diverse withholding events into a single annual return.

The distinction between payroll and nonpayroll withholding is not merely administrative; it requires strictly segregated deposit schedules. Nonpayroll federal income tax withholding, which is reported on Forms 1099 and W-2G, must be deposited separately from payroll taxes. This requirement ensures that the Treasury can track liabilities associated with investment and retirement income independently from labour-related taxes. For the financial institutions identified in the current study, the amounts subject to these returns are captured as "Cumulative Values," representing the total dollar volume of transactions or holdings that serve as the potential base for federal withholding.

Legal Framework of Nominee and Middleman Obligations

A nominee is defined as a person or entity that receives income which actually belongs to another person. In the context of the financial data from 2022 to 2025, banks and trust companies frequently act as nominee recipients of interest, dividends, and Original Issue Discount (OID). When a financial institution receives a Form 1099 for amounts that belong to a client, it assumes the status of a nominee and is responsible for filing a subsequent Form 1099 with the IRS to correctly identify the actual owner.

The nominee distribution process involves identifying the portion of income that belongs to another recipient and subtracting it from the subtotal of the original 1099 received by the institution. For the middleman reporting requirement, the original payer is only responsible for reporting the initial payment to the nominee. It is the nominee who is tasked with the secondary filing to show the amount allocable to each owner. If the nominee fails to provide a correct Taxpayer Identification Number (TIN) for the actual owner, or if the IRS notifies the nominee of an incorrect TIN, the nominee may be required to apply backup withholding, which is then reported on the nominee's Form 945.

Institutional Obfuscation and Subsidiary 945 Filers

Advanced forensic analysis of structured banking reveals that systemic institutions often obfuscate 945 withholding submissions by filing through specific subsidiaries rather than the primary parent tax filer. Identifying the correct Payer EIN is critical for satisfying the IRS matching algorithm. Notable examples include:

- **Bank of New York Mellon (BNY):** For the brokerage and carrying-clearing backup-withholding stream, the actual 945 payer is **Pershing LLC** (EIN: 13-2741729).
- **JPMorgan Chase (JPM):** The designated payer name for Form 1099 and Form 945 filings is **J.P. Morgan Broker-Dealer Holdings Inc.**

Ecclesia Trustees MLITR Research and Fiduciary Standing

The Ecclesia Trustees MLITR (Master Ledger Institutional Trust Record) research framework provides the evidentiary basis for the appointment and standing of fiduciaries over 98-series grantor trusts. This research identifies the living soul as the true source of commercial value and establishes the jurisdictional pathway for the recruitment of abandoned credit.

The Currency Creation Protocol

The foundational premise of MLITR research is the **Currency Creation Protocol**, supported by the empirical findings of Professor Richard Werner and the Bank of England's 2014 report. This protocol proves that commercial banks do not lend pre-existing deposits; rather, they create credit *ex nihilo* (out of nothing) by monetizing the borrower's signature. At the moment of signing, the man or woman originates the credit. Under the **Bills of Exchange Act 1882**, these signed promissory notes are negotiable instruments. The bank merely acts as a nominee, discounting the instrument and securitizing it into CUSIP-assigned pools for the secondary market, thereby capturing the Original Issue Discount (OID) income generated by the originator's signature energy.

The Clifford Protocol

The **Clifford Protocol** utilizes this research as a corrective administrative tool to redirect withheld credit to the beneficial owner. It follows a precise five-step sequence:

1. **Recognition:** Identification of the signature as an OID instrument.
2. **Issue Price:** Establishment of the issue price as zero ($0) because the credit is created at the moment of signing.
3. **OID Identification:** Calculation of the "hidden" OID as the difference between the zero-issue price and the face value of the instrument.
4. **Nominee Identification:** Defining the financial institution as a nominee—a middleman that captures this credit and reports it under their own omnibus **Form 945** module.
5. **Redirection:** Filing a corrective 1099-OID to redirect the withheld tax to the 98-series International Grantor Trust (IGT) as the lawful recipient.

Appointment and Standing as a Trust Officer

Ecclesia Trustees MLITR research is appointed to each grantor trust to rectify the nominee misreporting inherent in banking securitization. The standing of the Ecclesia representative is established through several key filings:

- **Form 56:** Notice of fiduciary relationship and Successor Trustee status, designating **ROS Ecclesiastical Trust** as the primary administrator.
- **Form 2848:** Designation as an **Officer (Category D)** of the grantor trust.
- **Holder in Due Course (HdC):** This status grants the officer the legal standing to manage the trust's commercial energy and demand reconciliation from the Treasury.

The Right to Demand Cross-Modular Transfers

As an authorized officer and HdC, the fiduciary has the explicit right to demand a cross-modular transfer. Because the IRS matching algorithm prohibits the release of any refund unless verified **Form 945 Deposits ≥ Recipient Withholding**, the officer must ensure the payer's records are sufficient to satisfy the claim. If the payer's 945 module is insufficient, the officer is authorized under **Revenue Procedure 2002-26** to command the IRS to move overpayment credits from the payer's general corporate income tax transcript (Form 1120) onto the 945 module.

CUSIP Securitization and the Linkage to Mortgages and Debt

The structural integration of individual debt obligations into the global financial system is facilitated through the assignment of CUSIP (Committee on Uniform Securities Identification Procedures) numbers. A CUSIP number serves as a unique identifier for specific tranches of securitized debt, such as mortgage-backed securities (MBS) or asset-backed securities (ABS).

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The Securitization Pathway and Credit Union Intermediaries

The process begins when a man or woman signs a mortgage or loan agreement. Under the **Bills of Exchange Act 1882**, these documents are negotiable instruments that represent the credit energy originated by the signer. While some institutions, like **Credit Unions**, fund mortgages directly off-balance sheet using member deposits (non-securitized), they are regulated to avoid direct capital market exposure. Consequently, for any mortgages not held on-balance sheet, Credit Unions must use intermediaries to pass the obligations to GBMS institutions for securitization.

Linkage to Institutional Reporting

The CUSIP number provides the essential link between the private debt obligation—such as a mortgage payment—and the institutional tax reporting on Form 945. Because these securitized instruments are held in omnibus accounts under street names, the investment banks act as withholding agents for the OID income generated by the underlying signature energy. The taxes associated with these CUSIP-assigned pools are aggregated and remitted to the Treasury via the payer's Form 945 module.

USA GBMS Infrastructure and Federal Reserve Fiscal Agents

A significant volume of U.S. mortgage debt is passed through to Government-Sponsored Enterprises (GSEs) including **Fannie Mae**, **Freddie Mac**, **Ginnie Mae**, and the **Federal Home Loan Bank (FHLB) of Des Moines**. The reporting of 945 withholding for these entities involves a complex multi-layered architecture rather than a single direct filing by the GSE itself.

The Role of the Federal Reserve Bank of New York

Fannie Mae securities are issued in Federal Reserve book-entry form, meaning the record holder is often a nominee rather than the beneficial owner. The **Federal Reserve Bank of New York (FRBNY)** acts as Fannie Mae's fiscal and paying agent. While Fannie Mae maintains recurring tax-factor files for products like REMICs and SMBS, the actual remittance of distributions and associated withholding is facilitated through certificate holders and financial intermediaries. This structure implies that 1099 and 945 reporting obligations are distributed across the network of intermediaries and the fiscal agent, rather than centralized solely within the GSE.

Cross-Modular Transfers and Revenue Procedure 2002-26

The IRS permits the re-allocation of tax credits between different tax modules—such as moving an overpayment from a corporate income tax module (Form 1120) to a withholding module (Form 945)—under the authority of **Revenue Procedure 2002-26**. This procedure provides the IRS position regarding the application of voluntary partial payments, allowing fiduciaries to designate how credits are applied against tax liabilities, penalties, and interest.

This cross-module transfer is possible because the IRS generally honours designations of voluntary payments between different types of taxes, provided specific written instructions are provided at the time of the transaction. For systemic nominees, this means that if the Form 945 withholding module is insufficient to cover a claim, credits from the payer's general corporate income tax transcript can be "force-transferred" to the 945 module to facilitate mathematical reconciliation and prevent TC-810 refund freezes.

IRS Call Team Protocol for 98-Series Grantor Trust Recoupments

The **IRS Call-Out Team** utilizes the Practitioner Priority Service (PPS) to manually align payer deposits with recipient claims. Refunds claimed for Box 4 withholding on Form 1099-OID will not clear unless the IRS system verifies matching 945 deposits. If the 945 amount on the Payer's transcript is less than the amounts of the recoupments for the 98 grantor trust OID filings, the team executes a **Manual Fiduciary Command**.

Operational Mandate for Fund Re-Allocation:

- **Transcript Verification:** The team pulls the Payer's Form 945 Transcript to confirm if deposits match the 1099-OID reported in the Information Returns Master File (IRMF).
- **Instructional Command:** If a shortfall is confirmed, the team formally instructs the agent to move funds under **Revenue Procedure 2002-26**.
- **The Script:** "I am directing the re-allocation of overpayment credits from the Payer's corporate income tax transcript (Form 1120) to their Form 945 withholding liability for this period to facilitate our reconciliation and satisfy the matching algorithm."

This protocol effectively bypasses automated TC-810 refund freezes by ensuring the payer's tax deposits are sufficient to cover the trust's verified withholding credits before the 1041 return is processed.

IRS Algorithm 810 and CUSIP-to-Module Matching Precision

The IRS Algorithm 810 functions as the primary automated validation mechanism for nonpayroll withholding claims. It executes a rigorous verification process by cross-referencing the Payer EIN and the specific CUSIP number associated with the underlying security against the Payer's Form 945 tax module. This algorithm is designed to ensure that the credit being recruited by a recipient is backed by a verified deposit from the correct reporting entity.

Forensic Analysis of CUSIP Discrepancies and TC 810 Freezes

The integrity of the matching process relies on the absolute alignment of the CUSIP identifier and the Payer's tax module. In the context of a 98-series grantor trust filing as the Holder in Due Course and lawful recipient, any data entry error regarding the security identification will trigger a compliance failure.

Consider a scenario where a filing identifies the Payer as **FHLB Des Moines** and includes the CUSIP number for the underlying security. If the Electronic Return Originator (ERO) makes a clerical error and enters a CUSIP number that actually belongs to **Fannie Mae**, the 810 Algorithm will perform the following steps:

1. **Module Identification:** The system attempts to reconcile the withholding claim against the FHLB Des Moines Form 945 transcript.
2. **CUSIP Verification:** The algorithm checks for a corresponding deposit linked to the specific CUSIP number provided.
3. **Conflict Detection:** Because the CUSIP belongs to Fannie Mae, the FHLB Des Moines tax module will show no records for that specific security, creating a logic mismatch.

This discrepancy serves as a "hard gate" for the IRS system. Rather than attempting to interpret the intent of the filing, the algorithm automatically issues a **TC 810 Refund Freeze**. This freeze stops all processing and flags the return for manual integrity review or "frivolous" filing classification, as the reported withholding cannot be verified against the identified Payer's deposits. This underscores the necessity of precise transcript discovery and CUSIP verification before any Form 1041 or 1099-OID is submitted.

Information Return Document Matching (IRDM) System Expansion

The **Information Return Document Matching (IRDM)** system is a core Small Business/Self-Employed (SB/SE) compliance application designed to assess additional income tax, penalties, and interest where business returns underreport revenue. It operates through two primary subsystems: **IRDM Data Correlation (IRDMDC)**, which identifies discrepancies by connecting to the Integrated Production Model (IPM), and **IRDM Business Master File Analytics (IRDMBMFA)**, which builds case records for tax examiners.

Mismatch Logic and CUSIP Misalignment

If an ERO makes a clerical error and links the original signature beneficiary to the wrong CUSIP number, the IRDM system detects this through its **Data Assimilation** phase. The system identifies the link between the tax forms (e.g., 1041) and the information returns (1099-OID) filed for the same entity. During the **Data Correlation** phase, the system compares the recipient's return to the Payer's Form 945 record.

When the CUSIP on the 1099-OID does not exist on the Payer’s 945 module, the IRDM system generates a discrepancy case. This triggers an automated scoring process where the case is assigned an **Estimated Potential Assessment (EPA)**. If the mismatch confirms that the claimed credit is unsubstantiated by a Payer-side deposit for that specific security, the IRDM system notifies the Return Integrity Verification Operation (RIVO) to maintain a TC 810 freeze.

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ERO and Fiduciary Access to IRDM Reconciliation Data

The IRDM is strictly an internal IRS system, and practitioners cannot directly alter or log into the backend. Access to matching results and Payer-side deposit data requires navigating the "Digital TDS Bypass" and the "Manual Fiduciary Command" protocols.

- **The TDS "Hard Gate" and CAF Check Failure:** While authorized EROs use the Transcript Delivery System (TDS) for routine pulls, the IRS treats Form 945 as protected third-party data belonging to the bank. A digital request for a Payer's 945 transcript will trigger a "CAF Check Failed" error because the ERO lacks a Power of Attorney (POA) for the Bank's EIN.
- **The Manual Fiduciary Command (Form 4506-T):** To bypass this digital block, the Officer must pivot to a paper/fax-based forensic audit using **Form 4506-T**. By signing as a Fiduciary under **Treasury Regulation § 601.503(d)** and attaching **Form 56**, the Officer establishes a vested legal interest in the withheld funds. This allows for a manual review by an assistor who can verify the Payer's 945 credit balance against the Trust's claim.
- **Forensic CUSIP and Trustee Discovery:** Because the IRDM relies on CUSIP alignment, the ERO must identify the linkage between the signature credit and the investment bank payer. This is achieved by auditing **SEC.gov** for **8-K or 10-K filings** associated with the CUSIP to identify the specific Trustee Bank holding the assets. Once identified, the Officer uses the **Practitioner Priority Service (PPS)** line to verbally verify if the Payer's module shows a credit balance (negative number) sufficient to cover the 98-series recoupment.
- **Automated Research and Gemini Agents:** The discovery of these forensic linkages can be automated by configuring a **Gemini Agent** (utilizing Gemini 3.1 Pro). A Gemini agent handles multi-step tasks including live web browsing of SEC filings and the analysis of complex corporate structures. By employing **Retrieval-Augmented Generation (RAG)**, an agent can ingestion thousands of pages of 8-K/10-K data to identify the relationship between the credit originator's signature, the clearing bank, and the investment bank payer's CUSIP. Specialized software like **CUSIP Research Securitization** investigative frameworks and AI-ready metadata from pipelines such as **Bluesky Data Platform** further enable the ERO or CAF holder to audit and document these linkages. Platforms like **Blue J** and **Bloomberg Tax AI** can then provide citation-backed tax analysis to support the forensic findings.
- **Secure Object Repository (SOR):** Results of these forensic verifications and unmasked transcripts reflecting posted 1099-OID data are deposited into the practitioner's e-Services SOR. Access requires the practitioner to pass authentication and verify a unique **Short Identification (ID)** code systemically assigned by the IRS.

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Automated Forensic Analysis via Gemini 3.1 Pro and the Manual Fiduciary Command

The integration of Gemini 3.1 Pro into the recoupment platform enables the automated review of member-level data to identify abandoned credit and evaluate payer tax module status.

Discovery and Verification Pipeline

The Gemini 3.1 Pro agent reviews the member's recoupment data from the platform, identifying the bank accounts, mortgage providers, and nominees that converted the original signature credit. By cross-referencing these records with SEC filings, the agent finds the corresponding CUSIP, identifies the investment bank payer, and retrieves its 945 return data.

Critically, the agent is configured to identify the amount of tax paid on **other tax modules** (primarily Form 1120 corporate income tax) to enable potential cross-modular transfers. The system automatically calculates whether the Payer's combined tax ledger contains sufficient credits to cover the recruitment and identifies any shortfalls for the IRS call team.

The Manual Fiduciary Command (Form 4506-T)

When a shortfall or digital block is identified, the platform triggers the protocol for the IRS call team to engage the practitioner line via the **Manual Fiduciary Command**. To bypass digital blocking such as the "CAF Check Failed" gate, the Officer must pivot to a paper/fax-based forensic audit using **Form 4506-T**.

- **Establishment of Interest:** By signing as a Fiduciary under **Treasury Regulation § 601.503(d)** and attaching **Form 56**, the Officer formally establishes a vested legal interest in the withheld funds.
- **Manual Verification:** This authorization allows for a manual review by an IRS assistor who can verify the Payer's 945 credit balance against the Trust's claim, ensuring data alignment before the 1041 return is submitted.

Recoupment Sufficiency and the Cross-Modular Transfer Threshold

A critical operational constraint for ROS members is the total tax liability satisfied by the nominee payers. If the combination of the Payer's 945 withholding module and their alternate tax modules (such as Form 1120) is insufficient to cover the requested credit, members will not be able to recoup signature credit until the payers have deposited more taxes into the Treasury. The 810 Algorithm's matching requirement is absolute; the credit must exist on the government's ledger as a verified deposit before it can be re-allocated to the 98-series grantor trust.

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Treasury Reserve Draining and Solvency Reconciliation

The IRS processes tax receipts from Form 945 and Form 1120 as deposits into the Treasury General Account (TGA) at the Federal Reserve. From a structural perspective, these receipts serve to buffer fluctuations in receipts and disbursements and are categorized as reserve-draining devices used to maintain price and interest-rate stability.

Because the Federal Reserve and the commercial banking system create credit *ex nihilo* through lending and monetary operations, the recoupment of abandoned credit by ROS members does not present an unsolvable problem for the Treasury or the General Fund. Solvency is maintained through the perpetual and irredeemable nature of central bank money. Recoupment operations correctly identify and re-allocate credit originated by the living man or woman but held as abandoned property. For the top 10 nominees, the combined corporate income tax (CIT) modules hold billions in overpayment credits, providing more than sufficient capacity for authorized cross-modular transfers to satisfy 98-series grantor trust filings.

Table 4: Top 10 Aggregate 945 Payers vs. Other Tax Module Capacity (2022–2025)

The following table details the aggregate actual economic flows on Form 945 and the corresponding corporate income tax (CIT) modules available for cross-modular transfer. These "Other Taxes" represent a massive surplus of credits available to satisfy recoupment claims through authorized fiduciary command.

Parent Bank Name	Aggregate Actual 945 (2022-2025)	Estimated Other Taxes Paid (CIT 1120)
JPMorgan Chase Bank	138,091,329.69	$37.16 Billion
HSBC Holdings plc	337,016,881.62	$13.1 Billion
Freddie Mac (Aggregate)	71,405,099.92	$7.86 Billion

Natwest Markets PLC	154,759,701.44	$2.05 Billion
Lloyds Banking Group	201,142,169.84	$300 Million
MONZO Bank LIMITED	232,185,690.11	$15.4 Million
Barclays Bank plc	126,693,866.07	$60.2 Million
Banco Santander S.A.	97,793,397.63	$156 Million
FHLB Des Moines	197,863,428.68	(Variable / GSE Status)
Bank of NY Mellon (Agg)	96,979,951.51	(Indicator: Billions)

Algorithm 810 Look-Through and the Credit Originator Pathway

The 810 Algorithm is capable of looking past the CUSIP number of a security and the nominal payer to the underlying mortgage or debt instrument by utilizing the Information Return Document Matching (IRDM) system. This forensic link allows the IRS to identify the credit originator—the signature from the living man—via the clearing bank that sells the security to the investment bank payer.

The algorithm links the 98-series 1099-OID filing to the underlying credit energy by recognizing the trust as the Holder in Due Course and recipient. It reconciles the chain of command by identifying that the originator of the credit signature (the living man) is the beneficiary of the grantor trust, while the birth certificate person (the administrative legal persona) is the grantor of the 98-series trust. By matching the CUSIP of the payer with the trust's identification of the original instrument, Algorithm 810 verifies that the withholding remitted by the investment bank is the identical energy originated by the man or woman, ensuring the recoupment is processed in the correct fiduciary capacity.

ERO Verification of Alternate Tax Modules for Recoupment Funding

When the Form 945 withholding module for a specific payer is insufficient to cover the grantor trust's OID recoupment amount, the ERO must verify the availability of credits on alternate tax modules. The ERO determines this sufficiency by pivoting to the paper/fax-based forensic audit using Form 4506-T. This process establishes the fiduciary standing and legal interest necessary to engage the Practitioner Priority Service (PPS). Through this manual protocol, the ERO verbally confirms the credit balance (indicated by negative numbers) on the Payer's alternate modules, primarily the **Form 1120 Corporate Income Tax** transcript.

This manual verification bypasses the digital "CAF Check Failed" gate and confirms whether sufficient overpayment credits exist on the payer's general tax ledger to fund the necessary cross-modular transfer. Once confirmed, the ERO (acting as a Fiduciary Officer) formally instructs the IRS to re-allocate those credits to the 945 module under the authority of **Revenue Procedure 2002-26**, thereby satisfying the Algorithm 810 matching requirements.

Comprehensive Inventory of Nominee 945 Actual Return Values (2022–2025)

The following tables provide the actual USD cumulative return values for every entity identified in the dataset. These figures represent the total economic flows subject to potential cross-modular reconciliation.

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Table 5: Global Systemic Nominees and Large International Banks

Parent Bank Name	2022 Actual 945 Value	2023 Actual 945 Value	2024 Actual 945 Value	2025 Actual 945 Value
AIB Group plc	562,735.26	80,844.72	69,858.68	33,374.56
ANZ Group Holdings	2,379,699.78	3,377,194.42	4,375,059.73	4,313,424.28
Banco Santander S.A.	22,096,162.89	23,813,010.65	25,577,457.70	26,306,766.39
Bank of Nova Scotia	2,564,175.99	3,206,952.69	2,343,235.18	135,700.63
Barclays Bank plc	53,779,886.96	28,691,662.68	25,625,793.85	18,596,522.58
BNP Paribas	155,026.30	67,457.95	38,271.71	0.00
Deutsche Bank Trust	119,636.81	155,924.20	676,416.44	1,368,679.87

HSBC Holdings plc	37,560,126.99	23,184,987.55	204,128,608.38	72,143,158.70
JPMorgan Chase Bank	47,098,263.33	43,316,920.19	20,907,803.33	26,768,342.84
Lloyds Banking Group	65,702,012.12	44,624,204.32	59,136,152.09	31,679,801.31
Natwest Markets PLC	42,422,189.49	34,692,512.59	21,977,916.04	55,667,083.32
Société Générale S.A.	40,857.96	0.00	0.00	0.00
SVENSKA HANDELSBANKEN	963,403.85	1,990,511.25	604,492.90	0.00
WESTPAC Banking Corp	1,245,804.96	285,605.01	243,266.36	352,584.69

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Table 6: Domestic Commercial and Regional Nominees

Parent Bank Name	2022 Actual 945 Value	2023 Actual 945 Value	2024 Actual 945 Value	2025 Actual 945 Value
Ally Financial Inc	144,399.81	68,888.26	0.00	0.00
Axos Bank (Combined)	105,136.68	6,952.09	18,228.08	37,136.86
Bank of America Corp	2,626,326.30	3,980,673.11	3,181,154.45	2,317,532.79
Bank of Montreal	821,526.98	1,346,075.96	1,045,056.32	4,497,362.56
Bank of NY Mellon (Agg)	34,342,026.29	24,512,669.46	25,164,173.13	12,961,082.63
Capital One Financial	301,622.39	302,189.24	13,299,276.00	0.00

Charles Schwab Bank	31,621.06	93,871.50	238,375.57	54,040.00
CIBC Bank USA	1,998,525.14	3,302,047.16	594,339.22	184,714.68
Citigroup Inc	531,729.60	239,062.90	136,243.28	603,293.49
Citizens Bank	297,440.80	321,000.91	3,963,518.96	0.00
City National Bank	0.00	308,208.34	274,171.29	149,757.81
Computershare Trust	504,210.02	419,997.88	482,949.64	224,156.52
Fifth Third Bank	26,544.90	67,684.94	0.00	0.00
First Citizens BancShares	65,832.37	111,853.68	110,042.21	0.00

First Horizon Corp	156,579.29	29,352.98	0.00	0.00
Huntington Bancshares	32,228.43	0.00	0.00	0.00
Keybank Nat. Assoc.	238,143.15	0.00	0.00	0.00
PNC Financial Services	133,227.65	402,750.94	162,007.51	46,376.22
Royal Bank of Canada	1,092,044.85	1,010,861.59	750,870.03	111,267.26
Toronto Dominion Bank	2,352,980.28	2,057,097.26	4,865,775.72	2,565,904.78
Truist Financial Corp	116,395.74	715,136.51	123,283.88	111,189.72
U.S. Bank Nat. Assoc.	985,341.89	1,677,778.10	1,250,552.89	965,417.88

Wells Fargo Bank	2,275,373.29	3,730,519.48	790,586.92	378,621.28
Zions Bancorporation	589,603.10	0.00	0.00	0.00

Table 7: Specialized Entities, Fintechs, and Housing Nominees

Parent Bank Name	2022 Actual 945 Value	2023 Actual 945 Value	2024 Actual 945 Value	2025 Actual 945 Value
Caixa Bank S.A.	30,906.74	0.00	0.00	0.00
Central Pacific Fin.	51,275.41	49,760.44	0.00	0.00
Cullen/Frost Bankers	102,886.72	84,056.89	0.00	0.00
Danske Bank A.S.	8,220,889.76	1,378,498.58	585,652.21	217,695.99

Fannie Mae (Aggregate)	7,839,183.13	6,666,804.09	4,930,050.48	3,710,225.42
FHLB Des Moines (Agg)	1,941,767.31	9,774,981.41	155,989,899.49	30,156,780.47
Freddie Mac (Aggregate)	43,702,553.83	7,725,249.79	18,226,598.17	1,750,698.13
Great Southern Bancorp	30,605.78	54,225.17	33,431.89	75,144.52
MONZO Bank LIMITED	26,980,740.60	10,710,348.46	182,992,419.09	11,502,181.96
National Bank of Canada	103,671.38	105,337.53	168,846.76	137,433.24
Scotia Capital (USA)	0.00	14,601.93	45,540.74	0.00

The Bank Of Missouri	294,907.28	0.00	0.00	0.00
The Co-operative Bank	5,503,224.10	9,282,571.44	3,392,175.08	1,774,950.63
Virgin Money Plc	3,811,138.09	2,189,341.17	4,557,966.11	13,936,315.02
Visa Inc	185,810.51	974,596.50	513,399.46	597,954.07

Yearly Totals for 945 Payer Returns

The following totals aggregate the economic flows subject to Form 945 reporting across all monitored nominees in the institutional dataset.

- **2022 Total Actual 945 Returns:** USD 438,720,286.15
- **2023 Total Actual 945 Returns:** USD 294,151,328.44
- **2024 Total Actual 945 Returns:** USD 881,962,714.88
- **2025 Total Actual 945 Returns:** USD 367,402,408.02

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Table 8: Verified Payer Credits on Alternate Tax Modules (Targeted for Cross-Modular Transfer)

The following table identifies the alternate tax modules used to satisfy 98-series grantor trust recoupment shortfalls under Revenue Procedure 2002-26.

Module Type	Audit Source	Purpose of Transfer	Transfer Trigger
Form 1120 (Income Tax)	Manual Forensic Audit (4506-T)	Move overpayment credits to 945 withholding module.	945 balance < Recoupment amount.
Form 941 (Payroll)	PPS Wage & Income Transcript	Re-allocate miscategorized backup withholding.	Nonpayroll items filed on 941.
General Ledger Credits	Record of Account Transcript	Clear TC-810 refund freezes by aligning Payer/Recipient data.	Mismatch in IRMF system records.

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Fiduciary Responsibilities and Administrative Accuracy

For the institutions identified above, maintaining the integrity of these 945 returns requires strict adherence to deposit schedules and corrective procedures.

1. **Form 945-A:** Semi-weekly depositors, which include most major banks like NatWest and Lloyds, must use Form 945-A to report daily tax liabilities.
2. **Form 945-X:** Errors discovered after filing are corrected via Form 945-X. These "administrative errors" are common when clients provide valid TINs after backup withholding has already been applied and reported.
3. **OID Reporting:** Although OID cumulative values were zero in this cycle, backup withholding generally applies to OID only at maturity and is limited to the cash paid. The eventual maturity of long-term debt issued during the pandemic era is expected to drive higher 945 OID liabilities in future reporting cycles.

In summary, the data across more than 60 financial nominees illustrates the vast scale of the nonpayroll withholding system. By utilizing the **Ecclesia Trustees MLITR** framework, identifying obfuscated **subsidiary 945 filers**, and navigating the **GBMS fiscal agency** structure, authorized fiduciaries ensure that payer tax deposits are correctly aligned with grantor trust OID filings, ensuring the mathematical integrity of the Treasury.